

August 31, 2022

VIA ECF

The Honorable Sarah L. Cave  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *DoorDash, Inc. v. City of New York*, No. 21 Civ. 7695-AT-SLC  
*Portier, LLC v. City of New York*, No. 21 Civ. 10347-AT-SLC  
*Grubhub Inc. v. City of New York*, No. 21 Civ. 10602-AT-SLC

Judge Cave:

Pursuant to the Court's August 1, 2022 Order (Dkt. 52), Co-Plaintiffs DoorDash, Inc. ("DoorDash"), Portier, LLC ("Portier"), and Grubhub Inc. ("Grubhub"), and Defendant City of New York ("the City") respectfully submit this Joint Letter to update the Court regarding the status of discovery in advance of the Telephonic Status Conference before Your Honor next Wednesday, September 7, 2022.

Since the parties' July 29, 2022 status update, the parties have continued negotiating over the scope of discovery and intend to continue producing additional responsive documents. The parties do not have any ripe disputes to present to the Court at this time.

However, while the parties have made and continue to make good progress in discovery, the parties all agree that good cause exists to further extend the case-management deadlines in order to allow sufficient time to complete document production, review thereof, and for depositions, as well as to ensure just and efficient determination of the issues in these consolidated cases. The parties are conferring about specific dates in an effort to develop a joint proposal across all three cases, which we hope and expect we will be in a position to present to the Court at next week's conference.

We thank the Court for its consideration.

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Respectfully submitted,

/s/ Anne Champion

Anne Champion

*Counsel for Plaintiff DoorDash, Inc.*

/s/ John C. Quinn

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*Counsel for Plaintiff Portier, LLC.*

/s/ Karen B. Selvin

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*Counsel for Defendant City of New York*

/s/ Joel L. Kurtzberg

Joel L. Kurtzberg

*Counsel for Plaintiff Grubhub Inc.*